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RIYADH - IN AFFILIATION WITH  
THE LAW OFFICE OF ABDULAZIZ H. FAHAD

August 10, 2001

136997 NHSTA-2001-9628-7  
9630-7**VIA FACSIMILE AND MESSENGER**Mr. Z. Taylor Vinson  
Office of the Chief Counsel  
National Highway Traffic Safety Administration  
U.S. Department of Transportation  
400 Seventh Street, S.W.  
Washington, D.C.Mr. Kenneth N. Weinstein  
Associate Administrator for Safety Assurance  
National Highway Traffic Safety Administration  
U.S. Department of Transportation  
400 Seventh Street, S.W.  
Washington, D.C. 20590Ms. Marilynne E. Jacobs, Director  
Ms. Barbara Gray, Imports Investigator  
Mr. Luke Loy, Import Certification and Compliance  
Office of Vehicle Safety Compliance  
National Highway Traffic Safety Administration  
U.S. Department of Transportation  
400 Seventh Street, S.W.  
Washington, D.C. 20590**Re: J.K. Technologies, L.L.C. — Petitions 484 and 485, 2001 Ferrari 360 and 550**

Ladies and Gentlemen:

As you know, currently pending before the Office of Vehicle Safety Compliance ("OVSC") are petitions 484 and 485, submitted by J.K. Technologies, L.L.C., and requesting eligibility determinations for the 2001 Ferrari 360 and 550, respectively. The initial public comment period on these petitions was to span the customary thirty (30) days, and close on June 20, 2001. However, more than one month thereafter, on July 26, 2001, your office published its

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decision to reopen the comment period pursuant to a request that your office received on June 27, 2001 (after the initial comment period had closed). The re-opened comment period closes today, August 10, 2001.

The express language of the Imported Vehicle Safety Compliance Act ("the Act"), Pub. L. No. 100-562, 102 Stat. 2818 (1988) (codified as amended at 49 U.S.C. §§ 30141-47 (1999)), which governs the petition process, directs the Secretary of Transportation to "provide for a minimum period of public notice and written comment consistent with ensuring expeditious, but complete, consideration and avoiding delay by any person." 49 U.S.C. § 30141 (b). The public comment period on petitions 484 and 485 has now lasted for nearly three months. This unwarranted and extended comment period does not comport with the clear dictates of the Act and is unnecessarily costing J.K. Technologies and its customers millions of dollars. Thus, it is the expectation of J.K. Technologies that the comment period will end today, as scheduled, and that a vehicle eligibility number will be assigned to these models immediately.

We trust that we will be able to work with your office to remedy this and the other issues addressed in our letter to your office of August 1, 2001. If that is not the case, please notify us immediately so that appropriate measures may be taken.

Sincerely,



John M. Dowd  
James C. Osborne, Jr.  
Elizabeth C. Peterson  
C. William Frick